

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**  
Caption in Compliance with D.N.J. LBR 9004-1(b)

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In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**AD HOC COMMITTEE OF SUPPORTING COUNSEL'S  
OBJECTION TO MRHFM'S PLAINTIFFS' MOTION TO DISQUALIFY  
RANDI S. ELLIS AS LEGAL REPRESENTATIVE FOR FUTURE TALC CLAIMANTS**

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

The Ad Hoc Committee of Supporting Counsel (the “AHC of Supporting Counsel”), by and through its counsel, Paul Hastings LLP, Cole Schotz P.C., and Parkins & Rubio LLP, hereby objects (the “Objection”) to *MRHFM'S Plaintiffs' Motion to Disqualify Randi S. Ellis as Legal Representative or Future Talc Claimants* [Docket No 1022] (the “Motion”).

The Motion should be denied. It is a baseless attack on Randi S. Ellis as Legal Representative for Future Talc Claimants (the “FCR”) and the requested relief is completely devoid of supporting facts or law. The FCR is charged with representing the interests of future talc claimants and it is necessary for her to meet with the various constituents in this case, including the Debtor, Johnson & Johnson, the Official Committee of Talc Claimants, and the AHC of Supporting Counsel. Carrying out her duties in this regard does not create the “appearance of impropriety”; to the contrary, such meetings are the course of action that the FCR must pursue in this case in order for the FCR to obtain and ensure a fair result for all future talc claimants.

In further support of this Objection, the AHC of Supporting Counsel asserts the Motion should be denied for the reasons set forth in the Letter to this Court from Walsh Pizzi O'Reilly Falanga, counsel to the FCR, dated July 17, 2023 [Docket No. 1046].

Dated: July 26, 2023

**COLE SCHOTZ P.C.**

/s/ Michael D. Sirota

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